

## **Exhibit A**



1 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants Google  
2 LLC (“Google”) and YouTube, LLC (“YouTube”) (collectively, “Defendants”) hereby object and  
3 respond to Plaintiffs’ Notice and Request for Production of Documents, Set 4 (“Requests”), as  
4 follows:

5 **PRELIMINARY STATEMENT**

6 Defendants’ responses reflect only the current state of Defendants’ knowledge and  
7 information gained through their reasonable investigation in this action regarding the documents  
8 and information Plaintiffs have requested. Defendants’ investigation and discovery in this action are  
9 continuing, and Defendants are continuing to evaluate what information may exist, how far back it  
10 is kept, and what burden may be associated with identifying and producing information, even if it  
11 exists. Defendants may learn of additional documents and information pertaining to the Requests.  
12 Defendants expressly reserve the right to revise or supplement their responses to the Requests  
13 without assuming any additional obligation to do so.

14 A response to a Request shall not be deemed a waiver of any applicable objection, including  
15 privilege, immunity, or protection, or an admission of relevancy. Defendants make any response on  
16 the condition that the inadvertent production and/or disclosure of privileged or otherwise protected  
17 information does not waive any of Defendants’ rights to protect such information, all of which are  
18 expressly reserved, and that Defendant may withdraw any such information inadvertently produced  
19 and/or disclosed as soon as identified. *See* Dkt. No. 248. By producing or agreeing to produce  
20 documents or information in response to any Request, Defendants do not concede that any aspect  
21 of Plaintiffs’ claims related to those topics are permissible under Section 230, the First Amendment  
22 to the United States Constitution and corresponding provisions of applicable State constitutions, or  
23 are otherwise relevant to this litigation. Defendants reserve the right to challenge the authenticity,  
24 admissibility, or use of any document produced, or information provided, in response to the  
25 Requests including without limitation in any hearing, proceeding, trial, or otherwise.

26 Any failure of Defendants to make a specific objection to any specific Request is not an  
27 admission that documents or information responsive to that Request exist. Likewise, any statement  
28 in this response that Defendants will produce documents or information in response to a specific

Request does not mean that Defendants in fact have any such documents, or that any such documents exist, or that Defendants will search all files maintained by any person or any source. In light of the breadth of the Requests and the ongoing nature of investigation and discovery, Defendants will produce non-privileged, non-protected documents and log privileged or work-product documents responsive to the Requests, if any, and as described herein (1) subject to any and all objections noted below; (2) on a rolling basis; and (3) subject to the provisions of (a) the ESI Protocol entered in the above-titled action (*see* Dkt. No. 690), (b) the privilege log protocol entered in the above-titled action (*see* Dkt. No. 740), (c) the MDL Protective Order (*see* Dkt. No. 586), and (d) the 502(d) Order (*see* Dkt. No. 248). This includes, but is not limited to, production from an agreed-upon list of custodians as well as other reasonable methods and parameters.

# **OBJECTIONS TO INSTRUCTIONS, RULES OF CONSTRUCTION, AND** **DEFINITIONS**

The following Objections apply to and are incorporated by reference into each and every response to the separately-numbered Requests as if set forth in full therein. From time to time a specific response may repeat one of these Objections for emphasis or for some other reason. The failure to repeat any of these Objections in any specific response shall not be interpreted as a waiver of any Objection to that response.

1. Defendants object to the Definitions, Rules of Construction, Instructions, and Requests to the extent they seek to impose on Defendants obligations over and above those contained in the applicable law, including, but not limited to, Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Northern District of California, the Standing Order for Discovery in Civil Cases before Judge Kang, or any other applicable rule, order, or law.

2. Defendants object to each of the Definitions, Rules of Construction, and Instructions to the extent that they call for the production of “all” documents or information described. Unless otherwise stated, Defendants will construe each Request to require Defendants to use only reasonable diligence to locate responsive documents or information subject to the provisions of the ESI Protocol entered into by the Parties in this matter (*see* Dkt. No. 690) and the Protective Order (*see* Dkt. No. 586) through a search of the documents of an agreed-upon and Court-ordered list of

1 custodians using the negotiated search terms over the applicable Relevant Time Period, and, if  
2 appropriate, non-custodial sources from which the collection and search for potentially relevant  
3 information is proportional to the needs of this case. Defendants object to the Requests to the extent  
4 that they purport to require Defendants to conduct anything other than a reasonable and diligent  
5 search for reasonably accessible files, including electronically-stored information, from accessible  
6 sources where responsive documents reasonably would be expected to be found. Any specific  
7 Request that seeks to require Defendants to exceed such a search is overly broad and unduly  
8 burdensome.

9         3. Defendants object to the definition of “Communication” to the extent it exceeds the  
10 scope contemplated by the Federal Rules of Civil Procedure, the Local Rules of the United States  
11 District Court for the Northern District of California, or other applicable law. Defendants further  
12 object to the definition as overly broad and unduly burdensome to the extent it encompasses  
13 information not relevant to the parties’ claims or defenses and would require Defendants to collect,  
14 review and/or produce information that is disproportionate to the needs of this case.

15         4. Defendants object to the definition of “Document” to the extent it exceeds the scope  
16 contemplated by the Federal Rules of Civil Procedure, the Local Rules of the United States District  
17 Court for the Northern District of California, or other applicable law. Defendants further object to  
18 the definition as overly broad and unduly burdensome to the extent it encompasses information not  
19 relevant to the parties’ claims or defenses and would require Defendants to collect, review, and/or  
20 produce information that is disproportionate to the needs of this case.

21         5. Defendants object to the definition of “Electronically Stored Information” or “ESI”  
22 to the extent it exceeds the scope contemplated by the Federal Rules of Civil Procedure, the Local  
23 Rules of the United States District Court for the Northern District of California, or other applicable  
24 law. Defendants further object to the definition as overly broad and unduly burdensome to the extent  
25 it encompasses information not relevant to the parties’ claims or defenses and would require  
26 Defendants to collect, review, and/or produce information that is disproportionate to the needs of  
27 this case.

6. Defendants object to Plaintiffs’ definition of the term “Identity” as overbroad, unduly burdensome, seeking the production of information that is not relevant to the claim or defense of any party, not proportional to the needs of the case, and to the extent the information sought is not reasonably accessible to Defendants upon reasonable diligence. Defendants further object that the term “Identity,” as defined, seeks information that invades the right of privacy in violation of Article I, Section 1 of the California Constitution.

7. Defendants object to Plaintiffs’ definition of the term “Including” as overbroad, unduly burdensome, seeking the production of information that is not relevant to the claim or defense of any party, not proportional to the needs of the case, and to the extent the information sought is not reasonably accessible to Defendants upon reasonable diligence. In particular, the definition of “Including” fails to reasonably define the scope of information sought and seeks information that is duplicative, not relevant to the subject matter of this litigation, and not likely to lead to the discovery of admissible evidence. Defendants further object on the ground that the definition of “Including” calls for information protected by the attorney-client privilege, the work product doctrine, and potentially other applicable privileges or protections.

8. Defendants object to Plaintiffs’ definition of the term “Named Features” as seeking the production of information that is not relevant to the claims or defenses of any party and not proportional to the needs of the case to the extent the information sought includes documents or information pertaining to allegations that this Court held were barred by Section 230 and/or the First Amendment in its November 14, 2023 Order (Doc. 430) at 16-19, 22 because such allegations directly target Defendants’ roles as publishers of third-party content, including:

- Failing to put “[d]efault protective limits to the length and frequency of sessions”(MAC ¶ 845(e));
- Failing to institute “[b]locks to use during certain times of day (such as during school hours or late at night”(id. at ¶ 845(h));
- Not providing a beginning and end to a user’s “Feed” (id. at ¶ 845(i));
- Publishing geolocating information for minors (id. at ¶ 845(t));
- Recommending minor accounts to adult strangers (id. at ¶ 845(u));
- Limiting content to short-form and ephemeral content, and allowing private content (id. at ¶ 864(l));
- Timing and clustering of notifications of third-party content in a way that promotes addiction (id. at ¶ 845(l));
- Use of algorithms to promote addictive engagement (id. at ¶ 845(j)); and
- Timing and clustering of notifications of Defendants’ content to increase addictive use (id. at ¶ 845(l)).

1  
2 9. Defendants object to Plaintiffs’ definition of the terms “Policy” or “Policies” as  
3 vague, ambiguous, indefinite, overbroad, unduly burdensome, seeking the production of  
4 information that is not relevant to the claim or defense of any party, not proportional to the needs of  
5 the case, and to the extent the information sought is not reasonably accessible to Defendants upon  
6 reasonable diligence. In particular, the terms “Policy” and “Policies” are vague, ambiguous, and  
7 overbroad in their use of the undefined terms “formal and informal,” “systems,” “customs,”  
8 “methods and means of implementation” and “responsible for their management and  
9 implementation”, and in their requirement that Defendants “Identify” the “Persons responsible for  
10 the management of their implementation.”

11 10. Defendants object to Plaintiffs’ definition of the terms “Relating to,” “relate to,”  
12 “referring to,” “refer to,” “reflecting,” “reflect,” “concerning,” and “concern” as vague, ambiguous,  
13 indefinite, overbroad, unduly burdensome, seeking the production of information that is not relevant  
14 to the claim or defense of any party, not proportional to the needs of the case, and to the extent the  
15 information sought is not reasonably accessible to Defendants upon reasonable diligence. In  
16 particular, the definition of these terms fails to reasonably define the scope of information sought  
17 and seeks information that is duplicative, not relevant to the subject matter of this litigation, and not  
18 likely to lead to the discovery of admissible evidence. Defendants further object on the ground that  
19 the definition calls for information protected by the attorney-client privilege, the work product  
20 doctrine, and potentially other applicable privileges or protections.

21 11. For purposes of responding to these Requests, “Relevant Geographic Area” means  
22 the United States of America, the European Union, the United Kingdom, and Australia. *See* Dkt.  
23 No. 953.

24 12. Defendants object to Plaintiffs’ definition of the term “Relevant Time Period” as  
25 vague, ambiguous, indefinite, overbroad, unduly burdensome, not proportional to the needs of the  
26 case, and inconsistent with the Court’s June 20, 2024, Order on the relevant time period applicable  
27 to Defendants (*see* Dkt. No. 953). Further, that the definition is overbroad, unduly burdensome and  
28 disproportional because it includes, *inter alia*, time periods for which claims would be barred under

1 the relevant statute of limitations, and time periods before and after the relevant underlying events.  
2 Defendant also objects to Plaintiffs' proposed Relevant Time Period as unduly burdensome given  
3 the huge quantities of data and documents that already would need to be collected, stored and  
4 searched even for a shorter time period. For purposes of Defendants' responses to the Requests and  
5 unless stated otherwise, "Relevant Time Period" means the period beginning January 1, 2015, and  
6 ending on April 1, 2024, with two exceptions. For document discovery regarding YouTube's  
7 recommendation system, including Watch Time, Relevant Time Period means the period beginning  
8 January 1, 2011, and ending on April 1, 2024. For document discovery regarding YouTube Kids,  
9 Relevant Time Period means the period beginning January 1, 2014, and ending on April 1, 2024.

10 13. Defendants object to Plaintiffs' definition of the term "Safety" as vague, ambiguous,  
11 indefinite, overbroad, unduly burdensome, seeking the production of information that is not relevant  
12 to the claim or defense of any party, not proportional to the needs of the case, and to the extent the  
13 information sought is not reasonably accessible to Defendants upon reasonable diligence. In  
14 particular, the term "Safety" is vague, ambiguous, and overbroad in its use of the undefined terms  
15 "wellbeing," "safety" and "protection from risks." Defendants further object to the definition to the  
16 extent that it includes "protection from risks of extortion, sextortion, trafficking, bullying,  
17 harassment, CSAM victimization or revictimization, and predation," which arises from and is  
18 dependent on third-party content and/or bad actors.

19 14. Defendants object to Plaintiffs' definition of the term "User Data" as vague,  
20 ambiguous, indefinite, overbroad, unduly burdensome, seeking the production of information that  
21 is not relevant to the claim or defense of any party, not proportional to the needs of the case, and to  
22 the extent the information sought is not reasonably accessible to Defendants upon reasonable  
23 diligence. In particular, the term "User Data" is vague, ambiguous, and overbroad in its use of the  
24 undefined terms "all information concerning the user of an account," "any data you collect," and  
25 "data related to the identity, behavior, activity, or characteristics of users."

26 15. Defendants object to Plaintiffs' definition of the terms "You," "Your," "Defendant,"  
27 and "Defendants" on the grounds that the definition is overbroad, vague and ambiguous, and unduly  
28 burdensome. Defendants further object to the definition to the extent it seeks information not



1 currently in the possession, custody, or control of Defendants. Defendants will respond solely on  
2 behalf of themselves (Google LLC and YouTube, LLC), and not any other subsidiaries or affiliates,  
3 or any other person or entity. Defendants further object to the definition on the grounds that it  
4 includes Defendants' attorneys and requires Defendants to provide a legal conclusion or to produce  
5 information that is protected by any privilege, including the attorney-client privilege, work product  
6 immunity doctrine, common interest privilege, or any other applicable privilege, immunity, or  
7 restriction on discovery. For purposes of responding to the Requests, "You," "Your," "Defendant,"  
8 and "Defendants" will be defined as Google LLC, YouTube, LLC, and those authorized agents and  
9 employees acting on its behalf and within the scope of their agency or employment.

10 16. Defendants object to Plaintiffs' definition of the term "Youth" as overbroad, unduly  
11 burdensome, seeking the production of information that is not relevant to the claim or defense of  
12 any party, and not proportional to the needs of the case to the extent the definition includes users  
13 who are 18 years old and older. For purposes of Defendants' responses to the Requests and unless  
14 stated otherwise, "Youth" means users who are under the age of 18.

15 17. Defendants object to Plaintiffs' definition of the term "YouTube Platform" because  
16 it is directed to the YouTube platform as a whole, rather than the specific features that the Court has  
17 concluded can provide the basis for a viable cause of action in this matter, and to the extent the  
18 information sought is not reasonably accessible to Defendants upon reasonable diligence.  
19 Defendants further object that the term "YouTube Platform" is vague, ambiguous, and overbroad in  
20 its use of the undefined terms "developed, tested, or made available for use," and "all features or  
21 surfaces accessible to some or all users of the platform."

22 18. Unless otherwise stated, Defendants will not withhold otherwise responsive and  
23 non-privileged draft versions of documents to the extent that Defendants collect and retain such  
24 drafts in the ordinary course of business and are able to locate such documents pursuant to a  
25 reasonable search, and to the extent the collection and production of this data is reasonable and  
26 proportional to the needs of this case. Defendants will only search for and collect draft versions of  
27 documents to the extent that those drafts are saved as separate documents and are collected and  
28 identified pursuant to the parties' agreement on date range, search terms, and custodians.

Defendants will not conduct a search for historic versions of a document created in Google Workspace. Defendants' discovery tools do not allow them to automatically collect each version of Google Workspace documents and so their collection would be unduly burdensome and not proportionate. *See* Fed. R. Civ. P. 26(a)(2)(B) ("A party need not provide discovery of electronically stored information from sources that the party identifies as not reasonably accessible because of undue burden or cost."). Defendants will not search for or produce, and thus will withhold, these historic "versions" of responsive documents on the basis of this objection.

The following responses to the Requests are provided subject to the foregoing Preliminary Statement and Objections, which are incorporated into each response.

### **OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION**

#### **DOCUMENT REQUEST NO. 54:**

All literature reviews, analyses, or syntheses You performed concerning the topics of addiction, compulsive use, problematic use, Safety, or Youth Users on social media platforms, including on Your Platform, and all of Your Communications concerning the same.

#### **RESPONSE TO DOCUMENT REQUEST NO. 54:**

Defendants object to this Request to the extent it obligates them to produce "all" responsive documents, which is unduly burdensome, not proportional to the needs of this case, and not required under the Federal Rules. Defendants object to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it seeks information in support of allegations barred by Section 230 or the First Amendment, including allegations held barred by this Court's decision on the Motion to Dismiss and allegations implicated by pending motions. Defendants further object to this Request as overbroad, not proportional to the needs of the case, and not relevant to any viable claim or defense in that it seeks discovery concerning non-minor and non-adolescent platform users. Defendants object to this Request to the extent it seeks information protected from disclosure by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege or protection and will withhold or redact as appropriate such information to the extent it exists. Defendants object to this Request to the extent the information sought is already in

1 government entities” and construe “media inquiries” as “requests for comment by news  
2 organizations”.

3 Defendants object to this Request to the extent it seeks information protected from  
4 disclosure by the attorney-client privilege, work-product doctrine, and/or any other applicable  
5 privilege or protection and will withhold or redact as appropriate such information to the extent it  
6 exists. Defendants object to this Request to the extent that it seeks materials relating to users located  
7 outside of the United States and/or features not available in the United States. Defendants object to  
8 this Request as unduly burdensome and not proportional to the needs of the case because the  
9 Request is not limited as to time.

10 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
11 reasonable search for documents sufficient to show lawsuits filed against and government  
12 investigations into YouTube in the United States during the Relevant Time Period regarding the  
13 mental or physical health of YouTube users who are minors, as well as documents sufficient to  
14 show YouTube's response(s) to media inquiries regarding the mental or physical health of YouTube  
15 users who are minors, and will produce any responsive non-privileged documents.

16 **DOCUMENT REQUEST NO. 62:**

17 All Documents concerning any crisis management or crisis communication structure,  
18 organization, or Policy considered or developed by You to respond to investigations, lawsuits,  
19 media inquiries, or government inquiries related to the Safety of Children, Teens, and Youth who  
20 use Your Platform, including the Persons involved in or responsible for such functions.

21 **RESPONSE TO DOCUMENT REQUEST NO. 62:**

22 Defendants object to this Request to the extent it obligates them to produce “all” responsive  
23 documents, which is unduly burdensome, not proportional to the needs of this case, and not required  
24 under the Federal Rules. Defendants object to this Request as overly broad, unduly burdensome,  
25 and not proportional to the needs of the case to the extent it seeks information in support of  
26 allegations barred by Section 230 or the First Amendment, including allegations held barred by this  
27 Court’s decision on the Motion to Dismiss and allegations implicated by pending motions, and  
28 because, as drafted, the request is not tailored to Plaintiffs’ remaining allegations and the way the

1 YouTube Platform allegedly contributes to the harm alleged. Defendants further object to this  
2 Request as overbroad, not proportional to the needs of the case, and not relevant to any viable claim  
3 or defense in that it seeks discovery concerning non-minor and non-adolescent platform users.  
4 Defendants object to this Request as vague and ambiguous in its use of the terms “crisis  
5 management,” “crisis communication” “structure,” “organization,” “respond to,” “investigations,”  
6 “media inquiries,” “government inquiries”; these vague terms make it unclear what activities the  
7 Request seeks information about.

8 Defendants object to this Request to the extent it seeks information protected from  
9 disclosure by the attorney-client privilege, work-product doctrine, and/or any other applicable  
10 privilege or protection and will withhold or redact as appropriate such information to the extent it  
11 exists. Defendants object to this Request to the extent it requires Defendants to create or compile  
12 new documents or arrangements of information that do not already exist or are not already  
13 maintained in the ordinary course of business. Defendants object to this Request as unduly  
14 burdensome and not proportional to the needs of the case because the Request is not limited as to  
15 time.

16 Subject to and without waiving any of the foregoing objections, Defendants are willing to  
17 meet and confer with Plaintiffs regarding the scope of this request, and to determine whether an  
18 agreement can be reached under which Defendants provide certain non-privileged documents  
19 responsive to this Request and proportional to the needs of this case, in a manner that does not  
20 subject Defendants to an undue burden.

21 **AMENDED RESPONSE TO DOCUMENT REQUEST NO. 62:**

22 Defendants amend and supplement their response as follows:

23 Subject to and without waiving any of the foregoing objections, Defendants respond that  
24 they provided extensive testimony regarding their corporate structure, including the structure of  
25 teams responsible for responding to lawsuits, government investigations and inquiries, and media  
26 inquiries in connection with their May 9, 2024, 30(b)(6) deposition. That production was sufficient  
27 to satisfy Defendants’ obligations with respect to this request.  
28

1 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
2 reasonable search for documents sufficient to show final versions of YouTube's policies during the  
3 Relevant Time Period for external communications concerning potential or actual adverse effects  
4 of its platform on YouTube users who are minors, and will produce non-privileged responsive  
5 documents.

6 **AMENDED RESPONSE TO DOCUMENT REQUEST NO. 68:**

7 Defendants amend and supplement their response as follows:

8 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
9 reasonable search of the documents of agreed upon and Court-ordered custodians using the  
10 negotiated search terms for final versions of YouTube's policies during the Relevant Time Period  
11 for external communications concerning potential or actual adverse effects of its platform on  
12 YouTube users' mental health, and will produce non-privileged responsive documents.

13 **DOCUMENT REQUEST NO. 69:**

14 Documents that constitute, identify, or reflect the Policies, process, and criteria used by You  
15 during the Relevant Time Period to evaluate or determine compensation for employees working in  
16 or with Unit(s) responsible in whole or part for issues related to Safety, addiction, and/or  
17 problematic use by Youth, Teens, and Children.

18 **RESPONSE TO DOCUMENT REQUEST NO. 69:**

19 Defendants object to this Request as overly broad, unduly burdensome, and not  
20 proportional to the needs of the case because, as drafted, the request seeks information regarding  
21 employee compensation is not tailored to Plaintiffs' allegations and the way the YouTube Platform  
22 allegedly contributes to the harm alleged. Defendants further object to this Request as overbroad,  
23 not proportional to the needs of the case, and not relevant to any viable claim or defense in that it  
24 seeks discovery concerning non-minor and non-adolescent platform users. Defendants object to this  
25 Request to the extent it seeks information protected from disclosure by the attorney-client privilege,  
26 work-product doctrine, and/or any other applicable privilege or protection and will withhold or  
27 redact as appropriate such information to the extent it exists. Defendants object to this Request to  
28 the extent it requires Defendants to create or compile new documents or arrangements of

1 information that do not already exist or are not already maintained in the ordinary course of  
2 business. Defendants object to this Request to the extent that it seeks materials relating to users  
3 located outside of the United States and/or features not available in the United States. Defendants  
4 object to this Request as unduly burdensome and not proportional to the needs of the case because  
5 the Request is not reasonably limited as to time.

6 Subject to and without waiving any of the foregoing objections, Defendants are willing to  
7 meet and confer with Plaintiffs regarding the scope of this request, and to determine whether an  
8 agreement can be reached under which Defendants provide certain non-privileged documents  
9 responsive to this Request and proportional to the needs of this case, in a manner that does not  
10 subject Defendants to an undue burden.

11 **AMENDED RESPONSE TO DOCUMENT REQUEST NO. 69:**

12 Defendants amend and supplement their response as follows:

13 Subject to and without waiving the foregoing objections, Defendants respond that they  
14 produced documents regarding the compensation of employees working in or with Units  
15 responsible for issues related to Safety, addiction, and/or problematic use by Youth, Teens, and  
16 Children, in connection with Topic 7 of Plaintiffs' 30(b)(6) deposition notices to Defendants. Those  
17 productions satisfy Defendants' obligations with respect to this request.

18 **DOCUMENT REQUEST NO. 70:**

19 All Documents received by You from any Person regarding any adverse effect on the Safety  
20 of a Child, Teen, or Youth user of Your Platform ("User Complaints") and Documents sufficient  
21 to show Your response to these User Complaints.

22 **RESPONSE TO DOCUMENT REQUEST NO. 70:**

23 Defendants object to this Request to the extent it obligates them to produce "all" responsive  
24 documents from "any Person," which is unduly burdensome, not proportional to the needs of this  
25 case, and not required under the Federal Rules. Defendants object to this Request as overly broad,  
26 unduly burdensome, and not proportional to the needs of the case to the extent it seeks information  
27 in support of allegations barred by Section 230 or the First Amendment, including allegations held  
28 barred by this Court's decision on the Motion to Dismiss and allegations implicated by pending

1 to belong to discovery bellwether plaintiffs through the process set forth in the User Account  
2 Information Order (Dkt. No. 616) who have asserted a claim against YouTube, and, subject to  
3 obtaining necessary user consent, will produce non-privileged responsive documents.

4 **DOCUMENT REQUEST NO. 71:**

5 Documents that constitute, identify, or describe Your Policies during the Relevant Time  
6 Period concerning User Complaints, including facilitating, documenting, reviewing, analyzing,  
7 discussing, responding to, and addressing User Complaints.

8 **RESPONSE TO DOCUMENT REQUEST NO. 71:**

9 Defendants object to this Request as overly broad, unduly burdensome, and not  
10 proportional to the needs of the case to the extent it seeks information in support of allegations  
11 barred by Section 230 or the First Amendment, including allegations held barred by this Court's  
12 decision on the Motion to Dismiss and allegations implicated by pending motions, and because, as  
13 drafted, the request seeks information regarding employee compensation is not tailored to  
14 Plaintiffs' remaining allegations and the way the YouTube Platform allegedly contributes to the  
15 harm alleged. Defendants further object to this Request as overbroad, not proportional to the needs  
16 of the case, and not relevant to any viable claim or defense in that it seeks discovery concerning  
17 non-minor and non-adolescent platform users. Defendants object to this Request to the extent it  
18 seeks information that is not relevant to the claims or defenses of any party. Defendants object to  
19 this Request to the extent it seeks information protected from disclosure by the attorney-client  
20 privilege, work-product doctrine, and/or any other applicable privilege or protection and will  
21 withhold or redact as appropriate such information to the extent it exists.

22 Defendants object to this Request as overly broad and unduly burdensome to the extent it  
23 requires Defendants to search custodian emails for responsive documents; email discovery as to  
24 this Request is not proportional because the request calls for information regarding YouTube's  
25 policies, and it is significantly less burdensome for Defendants to provide documents sufficient to  
26 accurately show those policies rather than email discussions that do not constitute final policies.  
27 Defendants object to this Request to the extent that it seeks materials relating to users located  
28 outside of the United States and/or features not available in the United States. Defendants object to



1 this Request as unduly burdensome and not proportional to the needs of the case because the  
2 Request is not reasonably limited as to time.

3 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
4 reasonable search for final versions of YouTube's policies for reviewing and responding to  
5 customer service tickets concerning the safety of users who are minors, for the Relevant Time  
6 Period, and will produce non-privileged responsive documents. To the extent this request seeks  
7 historical versions of documents, Defendants are willing to meet and confer with Plaintiffs to  
8 determine whether an agreement can be reached under which Defendants provide certain non-  
9 privileged final historical version responsive to this Request and proportional to the needs of this  
10 case, in a manner that does not subject Defendants to an undue burden.

11 **AMENDED RESPONSE TO DOCUMENT REQUEST NO. 71:**

12 Defendants amend and supplement their response as follows:

13 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
14 reasonable search for final versions of YouTube's policies for reviewing and responding to  
15 customer service tickets concerning the safety of users who are minors, for the Relevant Time  
16 Period, and will produce non-privileged responsive documents. To the extent this request seeks  
17 historical versions of documents, Defendants are willing to meet and confer with Plaintiffs to  
18 determine whether an agreement can be reached under which Defendants provide certain non-  
19 privileged final historical version responsive to this Request and proportional to the needs of this  
20 case, in a manner that does not subject Defendants to an undue burden. Defendants will, subject to  
21 and without waiving their objections, also conduct a reasonable search of the documents of agreed  
22 upon and Court-ordered custodians using the negotiated search terms for documents that describe  
23 those policies, and will produce non-privileged responsive documents.

24 **DOCUMENT REQUEST NO. 72:**

25 All Documents concerning Your Policies during the Relevant Time Period for intaking,  
26 processing, reviewing, investigating, and reporting to third parties (including governmental or non-  
27 governmental authorities or clearing houses for such reports) all complaints involving the use of  
28 Your Platform by Children, Teens, and Youth, including, with respect to each such Policy, its



1 consideration for adoption, implementation, evaluation, testing, revision, consideration for  
2 discontinuation, discontinuation (in whole or in part), or restriction.

3 **RESPONSE TO DOCUMENT REQUEST NO. 72:**

4 Defendants object to this Request to the extent it obligates them to produce “all” responsive  
5 documents, which is unduly burdensome, not proportional to the needs of this case, and not required  
6 under the Federal Rules. Defendants object to this Request as overly broad, unduly burdensome,  
7 and not proportional to the needs of the case to the extent it seeks information in support of  
8 allegations barred by Section 230 or the First Amendment, including allegations held barred by this  
9 Court’s decision on the Motion to Dismiss and allegations implicated by pending motions, and  
10 because, as drafted, the request seeks essentially any documents related to the use of YouTube by  
11 children, teens, and Youth, and is not tailored to Plaintiffs’ remaining allegations regarding how  
12 the YouTube Platform allegedly contributed to the harm alleged. Defendants further object to this  
13 Request as overbroad, not proportional to the needs of the case, and not relevant to any viable claim  
14 or defense in that it seeks discovery concerning non-minor and non-adolescent platform users.  
15 Defendants object to this Request as vague and ambiguous in its use of the terms and phrases  
16 “evaluation,” “testing,” “revision,” “consideration for discontinuation,” “discontinuation,”  
17 “restriction”; these vague terms make it unclear what actions the Request seeks information about.

18 Defendants object to this Request to the extent the information requested therein is not  
19 within their possession, custody, and/or control. Defendants object to this Request as overly broad  
20 and unduly burdensome to the extent it requires Defendants to search custodian emails for  
21 responsive documents; email discovery as to this Request is not proportional because the request  
22 calls for information regarding YouTube’s policies, and it is significantly less burdensome for  
23 Defendants to provide documents sufficient to accurately show those policies rather than email  
24 discussions that do not constitute final policies.

25 Defendants object to this Request to the extent it seeks information protected from  
26 disclosure by the attorney-client privilege, work-product doctrine, and/or any other applicable  
27 privilege or protection and will withhold or redact as appropriate such information to the extent it  
28 exists. Defendants object to this Request to the extent that its expansive scope seeks users’ personal

1 identifying information and may implicate the privacy rights of users who are entitled to protection  
2 under various consumer privacy laws, including the Stored Communications Act. Affected users  
3 should also be afforded an opportunity to object to disclosure of their personal identifying  
4 information, and such an opportunity may be required as a matter of law. Where documents contain  
5 information barred from disclosure in addition to responsive information, Defendants will redact  
6 information barred from disclosure under applicable privacy laws in accordance with the  
7 forthcoming ESI Order.

8 Defendants object to this Request to the extent that it seeks materials relating to users  
9 located outside of the United States and/or features not available in the United States. Defendants  
10 object to this Request as unduly burdensome and not proportional to the needs of the case because  
11 the Request is not reasonably limited as to time.

12 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
13 reasonable search for final versions of YouTube's policies for reviewing, responding to, and  
14 reporting to third parties customer service tickets regarding reports of underage users on YouTube,  
15 for the Relevant Time Period, and will produce non-privileged responsive documents. To the extent  
16 this request seeks historical versions of documents, Defendants are willing to meet and confer with  
17 Plaintiffs to determine whether an agreement can be reached under which Defendants provide  
18 certain non-privileged final historical version responsive to this Request and proportional to the  
19 needs of this case, in a manner that does not subject Defendants to an undue burden.

20 **AMENDED RESPONSE TO DOCUMENT REQUEST NO. 72:**

21 Defendants amend and supplement their response as follows:

22 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
23 reasonable search for final versions of YouTube's policies for reviewing, responding to, and  
24 reporting to third parties customer service tickets regarding reports of underage users on YouTube,  
25 for the Relevant Time Period, and will produce non-privileged responsive documents. To the extent  
26 this request seeks historical versions of documents, Defendants are willing to meet and confer with  
27 Plaintiffs to determine whether an agreement can be reached under which Defendants provide  
28 certain non-privileged final historical version responsive to this Request and proportional to the

1 needs of this case, in a manner that does not subject Defendants to an undue burden. Defendants  
2 will, subject to and without waiving their objections, also conduct a reasonable search of the  
3 documents of agreed upon and Court-ordered custodians using the negotiated search terms for  
4 documents that discuss changes or proposed changes to those policies, and will produce non-  
5 privileged responsive documents.

6 **DOCUMENT REQUEST NO. 73:**

7 Documents that constitute, identify, or describe Your Policies, mechanisms, or other means  
8 for reporting of CSAM on Your Platform during the Relevant Time Period and for Your review  
9 and response to such reports, including reporting by You to law enforcement or the National Center  
10 for Missing and Exploited Children or the International Centre for Missing and Exploited Children  
11 or the Internet Watch Foundation.

12 **RESPONSE TO DOCUMENT REQUEST NO. 73:**

13 Defendants object to this Request to the extent it seeks information that is not relevant to  
14 the claims or defenses of any party. Defendants object to this Request as overly broad, unduly  
15 burdensome, and not proportional to the needs of the case to the extent it seeks information in  
16 support of allegations barred by Section 230 or the First Amendment, including allegations held  
17 barred by this Court's decision on the Motion to Dismiss and allegations implicated by pending  
18 motions, and because, as drafted, the request is not tailored to Plaintiffs' remaining allegations and  
19 the way the YouTube Platform allegedly contributes to the harm alleged. Defendants object to this  
20 Request to the extent it seeks information protected from disclosure by the attorney-client privilege,  
21 work-product doctrine, and/or any other applicable privilege or protection and will withhold or  
22 redact as appropriate such information to the extent it exists. Defendants object to this Request to  
23 the extent the information requested therein is not within their possession, custody, and/or control.  
24 Defendants object to this Request as overly broad and unduly burdensome to the extent it requires  
25 Defendants to search custodian emails for responsive documents; email discovery as to this Request  
26 is not proportional because the Request calls for information regarding YouTube's policies and  
27 reporting mechanisms, and it is significantly less burdensome for Defendants to provide documents  
28

1 certain non-privileged final historical version responsive to this Request and proportional to the  
2 needs of this case, in a manner that does not subject Defendants to an undue burden.

3 **DOCUMENT REQUEST NO. 76:**

4 Documents that constitute, identify, or describe Your Policies, mechanisms, or other means  
5 for reporting harassing or bullying conduct directed at Children or Teens on Your Platform during  
6 the Relevant Time Period and for Your consideration and response to such reports, including  
7 reporting by You to law enforcement.

8 **RESPONSE TO DOCUMENT REQUEST NO. 76:**

9 Defendants object to this Request to the extent it seeks information that is not relevant to  
10 the claims or defenses of any party. Defendants object to this Request as overly broad, unduly  
11 burdensome, and not proportional to the needs of the case to the extent it seeks information in  
12 support of allegations barred by Section 230 or the First Amendment, including allegations held  
13 barred by this Court's decision on the Motion to Dismiss and allegations implicated by pending  
14 motions, and because, as drafted, the request is not tailored to Plaintiffs' remaining allegations and  
15 the way the YouTube Platform allegedly contributes to the harm alleged. Defendants object to this  
16 Request to the extent it seeks information protected from disclosure by the attorney-client privilege,  
17 work-product doctrine, and/or any other applicable privilege or protection and will withhold or  
18 redact as appropriate such information to the extent it exists. Defendants object to this Request to  
19 the extent the information requested therein is not within their possession, custody, and/or control.  
20 Defendants object to this Request as overly broad and unduly burdensome to the extent it requires  
21 Defendants to search custodian emails for responsive documents; email discovery as to this Request  
22 is not proportional because the Request calls for information regarding YouTube's policies and  
23 reporting mechanisms, and it is significantly less burdensome for Defendants to provide documents  
24 sufficient to accurately show those policies and mechanisms rather than email discussions that do  
25 not constitute final policies or mechanisms.

26 Defendants object to this Request to the extent that its expansive scope seeks users'  
27 personal identifying information and may implicate the privacy rights of users who are entitled to  
28 protection under various consumer privacy laws, including the Stored Communications Act.

1 Affected users should also be afforded an opportunity to object to disclosure of their personal  
2 identifying information, and such an opportunity may be required as a matter of law. Where  
3 documents contain information barred from disclosure in addition to responsive information,  
4 Defendants will redact information barred from disclosure under applicable privacy laws in  
5 accordance with the forthcoming ESI Order. Defendants object to this Request to the extent that it  
6 seeks materials relating to users located outside of the United States and/or features not available  
7 in the United States. Defendants object to this Request as unduly burdensome and not proportional  
8 to the needs of the case because the Request is not reasonably limited as to time.

9 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
10 reasonable search for final versions of public policies related to reporting CSAM or adult predatory  
11 conduct on YouTube and documents sufficient to show policies regarding the reporting of CSAM  
12 or adult predatory conduct to the National Center for Missing and Exploited Children, for the  
13 Relevant Time Period, and will produce non-privileged responsive documents. To the extent this  
14 request seeks historical versions of documents, Defendants are willing to meet and confer with  
15 Plaintiffs to determine whether an agreement can be reached under which Defendants provide  
16 certain non-privileged final historical version responsive to this Request and proportional to the  
17 needs of this case, in a manner that does not subject Defendants to an undue burden.

18 **DOCUMENT REQUEST NO. 77:**

19 Documents that constitute, identify, or describe Your Policies, mechanisms, or other means  
20 for reporting violations of Your Platform's Terms of Service or community standards during the  
21 Relevant Time Period and for Your consideration and response to such reports, including reporting  
22 by You to law enforcement or the National Center for Missing and Exploited Children or the  
23 International Centre for Missing and Exploited Children or the Internet Watch Foundation.

24 **RESPONSE TO DOCUMENT REQUEST NO. 77:**

25 Defendants object to this Request as overly broad, unduly burdensome, and not  
26 proportional to the needs of the case to the extent it seeks information in support of allegations  
27 barred by Section 230 or the First Amendment, including allegations held barred by this Court's  
28 decision on the Motion to Dismiss and allegations implicated by pending motions; to the extent it

1 and because, as drafted, the request seeks essentially any documents related to every possible  
2 violation of YouTube's Terms of Service or Community Guidelines, and is not tailored to Plaintiffs'  
3 remaining allegations regarding how the YouTube Platform allegedly contributed to the harm  
4 alleged. Defendants object to this Request as vague and ambiguous in its use of the phrases  
5 "efficacy of any reporting policies" and "deterrence to use of reporting process"; these vague  
6 phrases make it unclear what activities the request seeks information about.

7 Defendants object to this Request to the extent it seeks information that is not relevant to  
8 the claims or defenses of any party. Defendants object to this Request to the extent it seeks  
9 information protected from disclosure by the attorney-client privilege, work-product doctrine,  
10 and/or any other applicable privilege or protection and will withhold or redact as appropriate such  
11 information to the extent it exists. Defendants object to this Request to the extent it requires  
12 Defendants to create or compile new documents or arrangements of information that do not already  
13 exist or are not already maintained in the ordinary course of business. Defendants object to this  
14 Request to the extent the information requested therein is not within their possession, custody,  
15 and/or control.

16 Defendants object to this Request to the extent that it seeks materials relating to users  
17 located outside of the United States and/or features not available in the United States. Defendants  
18 object to this Request as unduly burdensome and not proportional to the needs of the case because  
19 the Request is not limited as to time.

20 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
21 reasonable search for final versions of reports analyzing the efficacy of CSAM and adult predatory  
22 reporting mechanisms on YouTube, for the Relevant Time Period, and will produce any responsive  
23 non-privileged documents.

24 **DOCUMENT REQUEST NO. 79:**

25 Your policies during the Relevant Time Period for the retention of reports of violations of  
26 Your Platform's Terms of Service; CSAM; sexual exploitation; or predatory conduct, sex  
27 trafficking, harassing, or bullying directed at Children or Teens on Your Platform.

28 **RESPONSE TO DOCUMENT REQUEST NO. 79:**

1 Defendants object to this Request as overly broad, unduly burdensome, and not  
2 proportional to the needs of the case to the extent it seeks information in support of allegations  
3 barred by Section 230 or the First Amendment, including allegations held barred by this Court's  
4 decision on the Motion to Dismiss and allegations implicated by pending motions; to the extent it  
5 seeks documents or other materials related to claims the Court has not permitted to proceed; and  
6 because, as drafted, the request seeks essentially any documents related to every possible violation  
7 of YouTube's Terms of Service or Community Guidelines, and is not tailored to Plaintiffs'  
8 remaining allegations regarding how the YouTube Platform allegedly contributed to the harm  
9 alleged. Defendants object to this Request as vague and ambiguous in its use of the term "report";  
10 this vague term makes it unclear what activities the request seeks information about. For purposes  
11 of responding to the Requests, Defendants construe "report" to mean "reports of suspected CSAM  
12 that YouTube makes to NCMEC".

13 Defendants object to this Request to the extent it seeks information that is not relevant to  
14 the claims or defenses of any party. Defendants object to this Request to the extent it seeks  
15 information protected from disclosure by the attorney-client privilege, work-product doctrine,  
16 and/or any other applicable privilege or protection and will withhold or redact as appropriate such  
17 information to the extent it exists. Defendants object to this Request to the extent that it seeks  
18 materials relating to users located outside of the United States and/or features not available in the  
19 United States. Defendants object to this Request as unduly burdensome and not proportional to the  
20 needs of the case because the Request is not reasonably limited as to time.

21 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
22 reasonable search for final versions of policies related to the retention of reports of CSAM or adult  
23 predatory conduct on YouTube, for the Relevant Time Period, and will produce any responsive  
24 non-privileged documents. To the extent this request seeks historical versions of documents,  
25 Defendants are willing to meet and confer with Plaintiffs to determine whether an agreement can  
26 be reached under which Defendants provide certain non-privileged final historical version  
27 responsive to this Request and proportional to the needs of this case, in a manner that does not  
28 subject Defendants to an undue burden.



1 burdensome and not proportional to the needs of the case because the Request is not limited as to  
2 time.

3 Subject to and without waiving any of the foregoing objections, Defendants will conduct a  
4 reasonable search for final versions of policies related to the retention of reports of CSAM or adult  
5 predatory conduct on YouTube and final versions of reports of any analyses concerning the efficacy  
6 of those policies, for the Relevant Time Period, and will produce any responsive non-privileged  
7 documents. To the extent this request seeks historical versions of documents, Defendants are willing  
8 to meet and confer with Plaintiffs to determine whether an agreement can be reached under which  
9 Defendants provide certain non-privileged final historical version responsive to this Request and  
10 proportional to the needs of this case, in a manner that does not subject Defendants to an undue  
11 burden.

12  
13 Dated: July 10, 2024

Respectfully submitted,

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